

EXHIBIT 9

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

**In Re CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION**

No.: M-07-5944 SC
 MDL NO. 1917

This Document Relates to:

Judge: Hon. Samuel Conti
 Special Master: Hon. Charles A. Legge
 (Ret.)

DIRECT PURCHASER ACTION

**OBJECTIONS AND RESPONSES OF
 PANASONIC CORPORATION OF
 NORTH AMERICA, MT PICTURE
 DISPLAY CO., LTD. AND PANASONIC
 CORPORATION (F/K/A MATUSHITA
 ELECTRIC INDUSTRIAL CO., LTD.)
 TO DIRECT PURCHASER
 PLAINTIFFS' FIRST SET OF
 INTERROGATORIES**

Pursuant to Rule 26 and 33 of the Federal Rules of Civil Procedure, Defendants Panasonic Corporation of North America (“PNA”), MT Picture Display Co., Ltd. (“MTPD”), and Panasonic Corporation, f/k/a Matsushita Electric Industrial Co., Ltd. (“Panasonic Corp.,” and together with PNA and MTPD, the “Panasonic Defendants”) hereby respond and object to the Direct Purchaser Plaintiffs’ (“Plaintiffs”) First Set of Interrogatories, dated March 12, 2010 (“Interrogatories”).

PRELIMINARY STATEMENT

The following objections and responses are based upon the information currently known and available to Panasonic Defendants. Discovery and investigation are in the preliminary stages and are ongoing, and may disclose the existence of additional facts or documents, add meaning to known facts or documents, or lead to additions, variations or changes to these objections and responses.

Without obligating themselves to do so, except to the extent required under the Federal Rules of Civil Procedure, Panasonic Defendants reserve the right to amend or supplement the responses as additional information is discovered, revealed, recalled or otherwise ascertained, and as further analysis, research, investigation and discovery disclose additional facts, documents, contentions or legal theories that may apply. Panasonic Defendants reserve the right to supplement the responses subject to any applicable Order by the Court. Further, Panasonic Defendants specifically reserve the right to utilize subsequently discovered information or evidence at trial.

The general and specific objections set forth below are intended to apply to all information provided pursuant to the Interrogatories. Furthermore, these responses do not in any way waive any objections by Panasonic Defendants, in this or in any subsequent proceeding, on any grounds, including objections as to the competency, relevancy, materiality, privilege or admissibility of the responses, or the subject matter thereof.

GENERAL OBJECTIONS

Panasonic Defendants assert the following general objections with respect to each of the Interrogatories:

1. Panasonic Defendants object to the Interrogatories, including the Instructions and Definitions section, to the extent they seek information beyond the permissible scope of discovery or seek to impose obligations beyond those imposed by Rules 26 and 33 of the Federal Rules of Civil Procedure, the Local Rules, or an applicable Order by the Court.

2. Panasonic Defendants object to the Interrogatories to the extent they seek information protected by the attorney-client privilege, the work product doctrine, or any other privilege or immunity. Any response is made without waiver of any privilege, claim of confidentiality, or other objection. Insofar as any response by Panasonic Defendants may be deemed to be a waiver of any privilege or right, such waiver shall be deemed to be a limited waiver with respect to that particular information only.

3. Panasonic Defendants object to the Interrogatories to the extent they seek information regarding matters that are neither relevant to the claims or defenses of any party nor reasonably calculated to lead to the discovery of admissible evidence.

4. Panasonic Defendants object to the Interrogatories to the extent they seek information regarding finished products containing cathode ray tubes that is not reasonably related to Plaintiffs' claims with respect to an alleged conspiracy directed at cathode ray tubes ("CRTs") on the grounds that such Interrogatories are overly burdensome and premature until such time as Plaintiffs establish a reasonable basis for their claims regarding "CRT Products" to justify the enormous burden that Plaintiffs seek to impose on Panasonic Defendants by pursuing discovery as to all such products.

5. Panasonic Defendants object to the Interrogatories to the extent they seek information regarding products that were not sold or purchased by Panasonic Defendants in the United States on the ground that such Interrogatories are unduly burdensome and irrelevant to this action as Plaintiffs' proposed class definition in their Consolidated Amended Complaint is

1 confined to “all persons . . . who directly purchased a Cathode Ray Tube Product . . . in the
2 United States.” See DP-CAC ¶ 1.

3 6. Panasonic Defendants object to the Interrogatories to the extent they seek
4 information regarding CRT television combination products on the grounds that such
5 Interrogatories are overly burdensome and are neither relevant to the claims or defenses of any
6 party nor reasonably calculated to lead to the discovery of admissible evidence.

7 7. Panasonic Defendants object to the Interrogatories to the extent they are vague,
8 ambiguous, confusing, overbroad, and/or unduly burdensome. Panasonic Defendants will
9 interpret the Interrogatories in a reasonable manner.

10 8. Panasonic Defendants object to the Interrogatories to the extent they seek
11 information and/or documents beyond the possession, custody or control of Panasonic
12 Defendants or their current officers, directors, or employees. Panasonic Defendants construe
13 each Interrogatory as requiring them to engage in a reasonable search for responsive
14 information within their possession, custody or control.

15 9. Panasonic Defendants object to the Interrogatories to the extent they seek
16 information that is a matter of public record, or otherwise equally accessible and/or
17 ascertainable to Plaintiffs (such as information that is currently within Plaintiffs’ control).

18 10. Panasonic Defendants object to the Interrogatories to the extent they are
19 compound and/or contain discrete subparts and exceed the limit of twenty-five interrogatories
20 in the Federal Rules of Civil Procedure. See Fed. R. Civ. P. 33(a)(1) (“Unless otherwise
21 stipulated or ordered by the court, a party may serve . . . no more than 25 written interrogatories,
22 including all discrete subparts.”).

23 11. Panasonic Defendants’ responses herein, and their production of information
24 and documents, do not in any way constitute an adoption of Plaintiffs’ purported Definitions of
25 words or phrases contained in the Interrogatories. Panasonic Defendants object to the
26 Definitions to the extent they: (i) Are unclear, ambiguous, overly broad or unduly
27 burdensome; (ii) Are inconsistent with the ordinary and customary meaning of the words or

1 phrases they purport to define; (iii) Seek to impose obligations different from, or in excess of,
 2 those created by the Federal Rules of Civil Procedure and the Local Rules; and/or (iv)
 3 Incorporate other purported Definitions that suffer from such defects. Without limiting the
 4 breadth and general application of these objections, Panasonic Defendants further object to the
 5 Definitions as follows:

6 a. Panasonic Defendants object to the definitions of the terms “Defendant,”
 7 “Employee,” “Your,” “You,” and “Yourself” on the grounds that the definitions are overly
 8 broad, unduly burdensome and beyond the scope of permissible discovery under the Federal
 9 Rules of Civil Procedure. Panasonic Defendants will respond for Panasonic Corporation,
 10 PNA, and MTPD.

11 b. Panasonic Defendants object to the definition of “CRT Products” on the grounds
 12 that the definition is overly broad, unduly burdensome, and seeks information that is neither
 13 relevant nor reasonably calculated to lead to the discovery of admissible evidence. To the
 14 extent the Interrogatories seeking information regarding “CRT Products” are not otherwise
 15 objectionable, Panasonic Defendants will respond regarding television sets containing CRTs
 16 and general purpose computer monitors containing CRTs, to the extent applicable (collectively,
 17 “Finished CRT Products”).

18 c. Panasonic Defendants object to the definition of “Relevant Time Period” on the
 19 grounds that, until the statute of limitations issues are resolved by the Court, the definition is
 20 overly broad and unduly burdensome. Judge Conti has directed the parties to Judge Legge to
 21 develop procedures for the early resolution of statute of limitations issues and to reduce the
 22 burden in connection therewith. Panasonic Defendants believe it is premature for them to have
 23 to respond to the Interrogatories from prior to the statute of limitations period until Judge Legge
 24 considers this issue and determines the proper scope of that burden. At this time, Panasonic
 25 Defendants will respond for the time period November 26, 2003 through November 26, 2007,
 26 based on the applicable limitations period (the “Limitations Period”).

27 d. Panasonic Defendants object to the definition of “Meeting” as including any

1 “contemporaneous presence of two or more persons for any purpose” on the grounds that the
 2 definition is overly broad, unduly burdensome, and seeks information that is neither relevant
 3 nor reasonably calculated to lead to the discovery of admissible evidence.

4 Consistent with applicable law, and without waiver or limitation of any of their
 5 general or specific objections, Panasonic Defendants made a good faith effort to interpret the
 6 objectionable Definitions and terms in these Interrogatories.

7 12. Panasonic Defendants’ responses herein, and their production of documents and
 8 information, do not in any way constitute an acceptance of Plaintiffs’ proposed Instructions.
 9 Panasonic Defendants object to the Instructions to the extent they: (i) Are unclear, ambiguous,
 10 overly broad or unduly burdensome; and/or (ii) Seek to impose obligations different from, or in
 11 excess of, those created by the Federal Rules of Civil Procedure, the Local Rules, or an
 12 applicable Order of the Court. Without limiting the breadth and general application of these
 13 objections, Panasonic Defendants further object to the Instructions as follows:

14 a. Panasonic Defendants object to the instruction in Paragraph 1 on the grounds
 15 that it is overbroad, unduly burdensome, and seeks information that is neither relevant nor
 16 reasonably calculated to lead to the discovery of admissible evidence.

17 b. Panasonic Defendants object to the instruction in Paragraph 3 regarding
 18 Federal Rule of Civil Procedure 33(d) to the extent it imposes obligations different from, or in
 19 excess of those created by the Federal Rules of Civil Procedure, the Local Rules, or an
 20 applicable Order of the Court.

21 13. Panasonic Defendants object to the Interrogatories to the extent they purport to
 22 require Panasonic Defendants to identify documents that have been or will be produced
 23 pursuant to Direct Purchaser Plaintiffs’ First Set of Requests for Production of Documents,
 24 dated June 4, 2008, or Direct Purchaser Plaintiffs Second Request for Production of
 25 Documents, dated March 10, 2010, on the grounds that such Interrogatories are duplicative and
 26 unduly burdensome.

27 14. Panasonic Defendants reserve all objections or other questions as to the

competency, relevance, materiality, privilege, or admissibility of any information produced in response to the Interrogatories at trial in this or any other action for any purpose whatsoever.

15. Panasonic Defendants hereby incorporate each of the foregoing general objections into every response below as though fully set forth therein.

RESPONSES AND OBJECTIONS TO INTERROGATORIES

INTERROGATORY NO. 1

State the name, address, and relationship to You of each person who prepared or assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)

RESPONSE TO INTERROGATORY NO. 1

Subject to and without waiver of the foregoing general objections, Panasonic Defendants respond that Takashi Nakano, Legal Affairs Group AVC Networks Company, Panasonic Corporation, 1-15 Matsuo-cho, Kadoma City, Osaka, 571-8504, Japan, assisted in the preparation of these responses for MTPD and Panasonic Corporation. In addition, Robert S. Marin, Vice President and General Counsel of Panasonic Corporation of North America, One Panasonic Way, 1B-7, Secaucus, New Jersey, 07094, assisted in the preparation of these responses for PNA.

INTERROGATORY NO. 2

Identify each current and former employee who has or had any managerial responsibility for recommending, reviewing, setting or approving prices, bids, quotes, or rebates for Your CRT and/or CRT Products during the Relevant Time Period. For each person identified, include his or her name, address, title, location, the division or unit of the company where he or she worked, and a description of his or her responsibilities throughout the Relevant Time Period.

RESPONSE TO INTERROGATORY NO. 2

Panasonic Defendants object to Interrogatory No. 2 on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, specifically by requesting information regarding products that were not purchased or sold in the United States.

Subject to and without waiver of the foregoing general and specific objections, the

bates ranges for documents produced by Panasonic Defendants that, after a diligent search, Panasonic Defendants have identified thus far as containing information responsive to this request are listed in Exhibit A attached hereto. Panasonic Defendants will produce additional documents responsive to Interrogatory No. 2, if any, when they make their additional document productions.

INTERROGATORY NO. 3

Identify each employee with pricing authority who attended any trade association during the Relevant Time Period relating to CRT and/or CRT Products and state with respect to each employee:

- (a) the trade association attended;
- (b) the dates of attendance;
- (c) any offices, chairs or committee positions held in each of the trade associations; and
- (d) the dates which those offices, chairs or committee positions were held.

RESPONSE TO INTERROGATORY NO. 3

Panasonic Defendants object to Interrogatory No. 3 on the grounds that it overly broad and unduly burdensome. Further, Interrogatory No. 3 seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, specifically by requesting information regarding trade associations outside the United States and trade associations involving Finished CRT Products. In addition, the phrase “pricing authority” is vague and ambiguous.

Subject to and without waiver of the foregoing general and specific objections Panasonic Defendants respond that, with respect to trade association meetings in the U.S., Shinichi Iwamoto, General Manager of Sales MTPDA(OH) from 2003-2006, who had authority to recommend prices in the U.S., attended a meeting in the U.S. of the Market Forecast Consortium on April 20, 2004. While at MTPD, Mr. Iwamoto also attended meetings held twice annually in Washington, D.C. involving the Electronic Industries Association and the Electronic Components, Assemblies and Materials Association.

INTERROGATORY NO. 4

Identify each actual or proposed agreement between You and any producer of CRT and/or CRT Products, including the named Panasonic Defendants in this coordinated proceeding, relating to prices, pricing, production or inventory levels of CRT and/or CRT Products during the relevant time period. Agreements shall include drafts. For every such actual or proposed agreement state:

- (a) the identity of the participants and all persons with knowledge thereof;
- (b) when such agreement was entered into;
- (c) where such agreement was entered into;
- (d) the terms of such agreement; and
- (e) when, how and which of your officers, directors or employees discovered the existence of such agreement.

RESPONSE TO INTERROGATORY NO. 4

Panasonic Defendants object to Interrogatory No. 4 on the grounds that it is overly broad and unduly burdensome. Further, Interrogatory No. 4 seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, specifically by requesting information regarding (i) products that were not sold in the United States or (ii) any Finished CRT Products. Panasonic Defendants object to Interrogatory No. 4 on the grounds that the phrase “each actual or proposed agreement” is vague, ambiguous, and improperly calls for a legal conclusion.

Subject to and without waiver of the foregoing general and specific objections, Panasonic Defendants will produce documents sufficient to identify agreements entered into between Panasonic Defendants and makers of CRTs for the purchase and/or sale of CRTs in the United States during the Limitations Period, if any, when they make their additional document productions. Other than purchase and sale agreements, Panasonic Defendants are not aware of any agreements that the Panasonic Defendants entered into with other sellers of CRTs that applied to CRTs sold in the United States.

INTERROGATORY NO. 5

Identify any meeting or communication between You and other producers of CRT and/or CRT Products during the Relevant Time Period, including the named Panasonic Defendants in this coordinated proceeding, regarding CRT and/or CRT Product pricing, price increase announcements, terms or conditions of sales, profit margins or market share,

1 production levels, inventory, customers, auctions, reverse auctions, dynamic bidding events,
2 or sales, and for each such meeting or communication:

- 3 (a) provide the date and location of the meeting or communication;
- 4 (b) identify the person(s) who initiated, called, organized, attended or participated
5 in the meeting or communication;
- 6 (c) describe the subject matter discussed and any information you provided or
7 received;
- 8 (d) describe every action taken by you as a result of the meeting or communication;
9 and
- 10 (e) identify all persons with knowledge relating to the meeting or communication.

11 **RESPONSE TO INTERROGATORY NO. 5**

12 Panasonic Defendants object to Interrogatory No. 5 on the grounds that it is vague,
13 ambiguous, overly broad, and unduly burdensome. Further, Interrogatory 5 seeks
14 information that is neither relevant nor reasonably calculated to lead to the discovery of
15 admissible evidence, specifically by requesting information regarding (i) products that were
16 not sold in the United States or (ii) any Finished CRT Products.

17 Subject to and without waiver of the foregoing general and specific objections,
18 Panasonic Defendants will identify documents sufficient to identify communications or
19 meetings between Panasonic Defendants and sellers of CRTs regarding CRTs that were sold
20 in the United States during the Limitations Period, if any, when they make their additional
21 document productions.

22 **INTERROGATORY NO. 6**

23 Identify each instance during the Relevant Time Period in which You or any other
24 producer of CRT and/or CRT Products, including the named Panasonic Defendants in this
25 coordinated proceeding, instituted a price increase or decrease for CRT and/or CRT Products,
26 and for each such instance:

- 27 (a) when such price increase or decrease was announced publicly;
- 28 (b) when such price increase or decrease was implemented;
- (c) the amount of the price increase or decrease;
- (d) whether such price increase or decrease was withdrawn;
- (e) each person with responsibility for implementing such price increase or
decrease or its withdrawal; and
- (f) any explanation given for such price increase or decrease or withdrawal.

1 RESPONSE TO INTERROGATORY NO. 6

2 Panasonic Defendants object to Interrogatory No. 6 on the grounds that it is vague,
 3 ambiguous, overly broad, and unduly burdensome. Further, Interrogatory No. 6 seeks
 4 information that is neither relevant nor reasonably calculated to lead to the discovery of
 5 admissible evidence, specifically by requesting information regarding products that were not
 6 sold in the United States.

7 Subject to and without waiver of the foregoing general and specific objections, the
 8 following are bates ranges for documents produced by Panasonic Defendants that, after a
 9 diligent search, Panasonic Defendants have identified thus far as containing information
 10 responsive to this request: PAN0000001-PAN0000515. Panasonic Defendants will
 11 produce additional documents sufficient to show price changes for CRTs and Finished CRT
 12 Products that were sold in the United States during the Limitations Period, if any, when they
 13 make their additional document productions.

14 INTERROGATORY NO. 7

15 Identify and describe all joint ventures, partnerships or other cooperative business
 16 relationships, during the Relevant Time Period, relating to CRT and/or CRT Products
 between You and any other CRT or CRT Products producer.

17 RESPONSE TO INTERROGATORY NO. 7

18 Panasonic Defendants object to Interrogatory No. 7 on the grounds that it is overly
 19 broad and unduly burdensome. Further, Interrogatory No. 7 seeks information that is neither
 20 relevant nor reasonably calculated to lead to the discovery of admissible evidence, specifically
 21 by requesting information regarding (i) products that were not sold in the United States or (ii)
 22 any Finished CRT Products. Panasonic Defendants object to Interrogatory No. 7 on the
 23 grounds that the term “partnership” and the phrase “other cooperative business relationships”
 24 are vague and ambiguous.

25 Subject to and without waiver of the foregoing general and specific objections,
 26 Panasonic Defendants respond that, in 2003, Matsushita Electric Industrial (“MEI,” what is
 27 now known as Panasonic Corp.) formed a joint venture with Toshiba called MT Picture

1 Display Co., Ltd. (“MTPD”) – in which Toshiba held 35.5% of the joint venture and MEI
 2 held 64.5% of the venture. At the time of MTPD’s formation, MEI put its CRT
 3 manufacturing operations into MTPD.

4 Specifically, on January 21, 2003, Matsushita Display Devices Corporation of
 5 America (“MDCCA”) was incorporated as a wholly-owned subsidiary of MEI. Matsushita
 6 Electric Corporation of America (“MECA,” what is now known as PNA) transferred the
 7 assets and liabilities of Matsushita Display Devices Company of America (“MDDA”) and
 8 certain other assets to MDCCA. On January 29, 2003, MEI and Toshiba agreed to form a
 9 joint venture. On March 20, 2003, MEI transferred its shares of MDDCA stock to MTPD.
 10 On October 1, 2003, MDDCA changed its name to MTPDA(OH). On the same day,
 11 Toshiba Display Devices, Inc. (“TDD”) changed its name to MTPDA(NY). On October 31,
 12 2003, MT Picture Display of America (“MTPDA”) was incorporated to serve as a holding
 13 company for MTPDA(OH) and MTPDA(NY).

14 MTPDA(OH) and MTPDA(NY) were the U.S. CRT manufacturing subsidiaries.
 15 These subsidiaries were separate legal entities both wholly owned by MTPDA, which in turn
 16 was wholly owned by MTPD– the joint venture. Both MTPDA(OH) and MTPDA(NY)
 17 produced color picture tubes (“CPTs”). Color display tubes (“CDTs”) were not
 18 manufactured in the U.S. by the Panasonic Defendants during the Limitations Period.

19 MTPD also had manufacturing subsidiaries operating in Malaysia (MTPDM);
 20 Germany (MTPDG); Thailand (MTPDT); and Indonesia (MTPDI). Some of the
 21 manufacturing subsidiaries had, before the joint venture, been Toshiba businesses; others had
 22 previously been Matsushita businesses.

23 By December of 2004, MTPDA (NY) had ceased operations. It dissolved on March
 24 31, 2006. By January of 2006, MTPDA (OH) had ceased operations. It dissolved on
 25 March 27, 2007. MTPDA, the holding company, dissolved on March 27, 2007. In 2007,
 26 MEI became the 100% owner of MTPD. The remaining MTPD subsidiaries are dissolved or
 27 their shares were sold to third parties.

INTERROGATORY NO. 8

Identify every channel used by You to sell, market, or distribute CRT and/or CRT Products during the Relevant Time Period. If You used different channels at different points within the Relevant Time Period, identify when You used each channel to sell, market, or distribute CRT and/or CRT Products.

RESPONSE TO INTERROGATORY NO. 8

Panasonic Defendants object to Interrogatory No. 8 on the grounds that it is overly broad and unduly burdensome. Further, Interrogatory No. 8 seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, specifically by requesting information regarding products that were not sold in the United States.

Panasonic Defendants further object to Interrogatory No. 8 on the ground that the term “channel” is vague and ambiguous.

Subject to and without waiver of the foregoing general and specific objections, Panasonic Defendants respond that, from the creation of MTPD through March 31, 2004, Panasonic Industrial Corporation (“PIC”), an unincorporated business division of PNA, served as the U.S. sales agent for MTPD. With respect to sales to independent third parties, the sales were generally invoiced by the manufacturing company to the sales company, which re-invoiced the independent third parties. The sales company only performed the functions of a sales agent (*i.e.*, providing logistical services and re-invoicing), for which it added a standard margin to the price to be invoiced to it by the manufacturing subsidiary. After March 31, 2004, sales to third parties were made directly by the respective MTPD manufacturing company. In the U.S., MTPD did not sell CRTs using a distributor.

Panasonic Defendants further respond that the following are bates ranges for documents produced by Panasonic Defendants that, after a diligent search, Panasonic Defendants have identified thus far as containing information responsive to this request: PAN0000001-PAN0000515. Panasonic Defendants will produce additional documents sufficient to show sales of CRTs and Finished CRT Products by Panasonic Defendants in the U.S. during the Limitations Period, if any, when they make their additional document

1 productions.

2 **INTERROGATORY NO. 9**

3 Identify every channel used by you to purchase CRTs and/or CRT Products during the
4 Relevant Time Period. If You used different channels at different points within the Relevant
Time Period, identify when You used each channel to purchase CRT or CRT Products.

5 **RESPONSE TO INTERROGATORY NO. 9**

6 Panasonic Defendants object to Interrogatory No. 9 on the grounds that it is overly
7 broad and unduly burdensome. Further, Interrogatory No. 9 seeks information that is neither
8 relevant nor reasonably calculated to lead to the discovery of admissible evidence, specifically
9 by requesting information regarding products that were not purchased by Panasonic Defendants
10 in the United States. Panasonic Defendants further object to Interrogatory No. 9 on the ground
11 that the term “channel” is vague and ambiguous.

12 Subject to and without waiver of the foregoing general and specific objections,
13 Panasonic Defendants respond that, during the Limitations Period, Panasonic Defendants or
14 their affiliates in the United States purchased some television sets containing CRTs from other
15 related Panasonic entities. Panasonic Defendants will produce documents sufficient to
16 identify such purchases when they make their additional document productions. In addition,
17 Panasonic Defendants will produce documents sufficient to identify U.S. purchases of CRTs
18 during the Limitations Period, if any, when they make their additional document productions.

19 **INTERROGATORY NO. 10**

20 Identify the CRTs and/or CRT Products that You manufactured or produced for each
21 month within the Relevant Time Period, including the brand name, product number, and
intended use.

22 **RESPONSE TO INTERROGATORY NO. 10**

23 Panasonic Defendants object to Interrogatory No. 10 on the grounds that it is overly
24 broad and unduly burdensome. Further, Interrogatory No. 10 seeks information that is
25 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence,
26 specifically by requesting information regarding products that were not manufactured or
27 produced in the United States.

1 Subject to and without waiver of the foregoing general and specific objections, the
 2 following are bates ranges for documents produced by Panasonic Defendants that, after a
 3 diligent search, Panasonic Defendants have identified thus far as containing information
 4 responsive to this request: PAN0000001-PAN0000515. Panasonic Defendants will
 5 produce additional documents sufficient to identify CRTs that were manufactured or produced
 6 by Panasonic Defendants in the U.S. during the Limitations Period, if any, when they make
 7 their additional document productions.

8 **INTERROGATORY NO. 11**

9 Identify the CRT and/or CRT Products You sold, marketed, or distributed for each
 10 month within the Relevant Time Period, including the brand name, product number, and
 intended use.

11 **RESPONSE TO INTERROGATORY NO. 11**

12 Panasonic Defendants object to Interrogatory No. 11 on the grounds that it is overly
 13 broad and unduly burdensome. Further, Interrogatory No. 11 seeks information that is
 14 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence,
 15 specifically by requesting information regarding products that were not sold in the United
 16 States.

17 Subject to and without waiver of the foregoing general and specific objections, the
 18 following are bates ranges for documents produced by Panasonic Defendants that, after a
 19 diligent search, Panasonic Defendants have identified thus far as containing information
 20 responsive to this request: PAN0000001-PAN0000515. Panasonic Defendants will
 21 produce additional documents sufficient to identify sales of CRTs and Finished CRT Products
 22 by Panasonic Defendants in the U.S. during the Limitations Period, if any, when they make
 23 their additional document productions.

24 **INTERROGATORY NO. 12**

25 Provide Your sales of CRT and/or CRT Products to the United States and globally for
 26 each month from January 1, 1991 to the present. For each month during this period, state the
 27 volume of sales, the U.S. dollar value of sales, the unit sale price, the per unit cost to produce
 CRT and/or tariff, customs, duties, inland freight, storage, insurance, dealer commissions, and

the per unit profit earned.

RESPONSE TO INTERROGATORY NO. 12

Panasonic Defendants object to Interrogatory No. 12 on the grounds that it is overly broad and unduly burdensome. Further, Interrogatory No. 12 seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, specifically by requesting information regarding products that were not sold in the United States.

Subject to and without waiver of the foregoing general and specific objections, the following are bates ranges for documents produced by Panasonic Defendants that, after a diligent search, Panasonic Defendants have identified thus far as containing information responsive to this request: PAN0000001-PAN0000515. Panasonic Defendants will produce additional documents sufficient to identify sales of CRTs and Finished CRT Products by Panasonic Defendants in the U.S. during the Limitations Period, if any, when they make their additional document productions.

INTERROGATORY NO. 13

If You offered different prices to different markets, or on a spot market versus contract basis, during the Relevant Time Period, so indicate in the statistical data supplied in response to Interrogatory No. 6.

RESPONSE TO INTERROGATORY NO. 13

Panasonic Defendants object to Interrogatory No. 13 on the grounds that it is overly broad and unduly burdensome. Further, Interrogatory No. 13 seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, specifically by requesting information regarding products that were not sold in the United States.

Subject to and without waiver of the foregoing general and specific objections, the following are bates ranges for documents produced by Panasonic Defendants that, after a diligent search, Panasonic Defendants have identified thus far as containing information responsive to this request: PAN0000001-PAN0000515. Panasonic Defendants will

1 produce additional documents sufficient to show prices paid for CRTs and Finished CRT
 2 Products sold by Panasonic Defendants in the U.S. during the Limitations Period (which will
 3 show any differences in prices), if any, when they make their additional document
 4 productions.

5 **INTERROGATORY NO. 14**

6 Provide Your aggregate purchases (in both number of units and revenue in U.S.
 7 dollars) of CRT and/or CRT Products for each month from January 1, 1991 to the present.

8 **RESPONSE TO INTERROGATORY NO. 14**

9 Panasonic Defendants object to Interrogatory No. 14 on the grounds that it is overly
 10 broad and unduly burdensome. Further, Interrogatory No. 14 seeks information that is
 11 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence,
 12 specifically by requesting information regarding products that were not purchased in the
 13 United States.

14 Subject to and without waiver of the foregoing general and specific objections,
 15 Panasonic Defendants will produce documents sufficient to show units of CRTs or Finished
 16 CRT Products purchased by Panasonic Defendants in the U.S. during the Limitations Period,
 17 if any, when they make their additional document productions.

18 **INTERROGATORY NO. 15**

19 Provide Your aggregate purchases (in units and U.S. dollars) of CRT or CRT Products
 20 from each of the other named defendants in this coordinated proceeding, for the purpose of
 resale, for each month during from January 1, 1991 to the present.

21 **RESPONSE TO INTERROGATORY NO. 15**

22 Panasonic Defendants object to Interrogatory No. 15 on the grounds that it is overly
 23 broad and unduly burdensome. Further, Interrogatory No. 15 seeks information that is
 24 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence,
 25 specifically by requesting information regarding products that were not purchased in the
 26 United States.

27 Subject to and without waiver of the foregoing general and specific objections,

Panasonic Defendants respond that, during the Limitations Period, Panasonic Defendants or their affiliates in the United States purchased television sets containing CRTs from other related Panasonic entities. Panasonic Defendants will produce documents sufficient to identify the units purchased when they make their additional document productions. In addition, Panasonic Defendants will produce documents sufficient to show the units of CRTs purchased in the U.S. during the Limitations Period, if any, when they make their additional document productions.

INTERROGATORY NO. 16

State whether any documents or information responsive to this set of interrogatories were destroyed, discarded, erased, deleted, purged, or otherwise lost. If Your answer is in any way in the affirmative:

- (a) describe in detail the contents of each such document or information and the date it was destroyed, discarded, erased, deleted, purged or lost;
- (b) identify each person who had any role or responsibility in destroying, discarding, erasing, purging, deleting or losing of each such document or information; and
- (c) describe in detail the circumstances under which each such document or information was destroyed, discarded, erased, deleted, purged, or lost.

RESPONSE TO INTERROGATORY NO. 16

Panasonic Defendants object to Interrogatory No. 16 on the grounds that it is overly broad, unduly burdensome, beyond the permissible scope of discovery and seeks to impose obligations beyond those imposed by Rules 26 and 33 of the Federal Rules of Civil Procedure.

Subject to and without waiver of the foregoing general and specific objections, Panasonic Defendants respond that, from the time this litigation was reasonably anticipated, Panasonic Defendants have complied with their obligation under the Federal Rules of Civil Procedure to take reasonable steps to preserve information that was reasonably thought to be relevant to this action.

1 Dated: May 12, 2010

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Matsushita Electric Industrial Co.)*

Exhibit A

Start Bates	End Bates
MTPD-0009585	MTPD-0009585
MTPD-0009995	MTPD-0009995
MTPD-0010016	MTPD-0010016
MTPD-0010510	MTPD-0010510
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